



**General Services Administration
National Capital Region**

July 24, 2020

Noah R. Meissner, Esq.
WATT, TIEDER, HOFFAR & FITZGERALD, LLP
1765 Greensboro Station Pl., Suite 1000
McLean, VA 22102

Subject: 1800F Collocation, Auditorium, and Childcare Center Project (Contract No. 47PM1119C0006 (the "Contract")) – Warner Construction Suspension of Services

Dear Mr. Meissner:

As you are aware, GSA received email notification from Warner Construction, a subcontractor to CAC/Motir Joint Venture, LLC (the "JV"), regarding its decision to suspend services, on close of business, July 23, 2020 due to non-payment. It was our understanding that the JV and surety had resolved all payment issues. It has been represented to GSA that the surety has taken over the management of the project. Accordingly, GSA requests your assistance in immediately resolving this matter.

In accordance with Section III.C Contractor Management and Personnel of the contract, the JV is required to provide sufficient management and contract administration resources for the project. These services are a crucial component for the coordination and management of the remaining construction services to be provided. GSA is concerned that Warner Construction's suspension of work will impede progress on the project and ultimately delay the promised completion date of September 20, 2020.

GSA expects the JV to continue to provide contract compliant on-site and home office leadership for the remainder of the project. The inability of the JV to provide these services would be considered a breach of contract.

Sincerely,

Chrischanda S. Smith,
Contracting Officer
General Services Administration

cc: Aaron Hassinger, GSA; Christopher Hudson-Boyd, GSA; Ashley Abdullah, AFG; Kai Goodrich, AFG; Jennifer Jones, CAC/Motir; Harry McKee III, Surety; Shuraie Mackin, SBA; Pamela Mannion, SBA; Patricia Plummer, CAC/Motir; Emmanuel Irono, CAC/Motir